

Supplier Code of Conduct

Air Lease Corporation (“Air Lease”) is committed to operating with the highest standards for social and environmental responsibility as well as ethical conduct. Air Lease believes in doing business with companies that have the same standards. This Supplier Code of Conduct (“Code”) sets forth Air Lease’s expectations for the suppliers, vendors, and other providers of goods and services (each a “Supplier”) with which Air Lease does business. Air Lease expects each of our Suppliers to have a sustainable procurement policy in place for their own suppliers, and to communicate our expectations contained in this Code to their workers and their suppliers and vendors.

Labor

Human Rights: Air Lease is committed to respecting fundamental human rights in its business operations, including its supply chain. In addition to obeying all laws that require the fair treatment of workers, Suppliers are required to implement policies to ensure they do not engage in or support forced or unlawful child labor:

- **No Forced Labor:** Under no circumstances may a Supplier use forced or prison labor. All workers will understand the terms of their employment and employment decisions will be based on free choice.
- **No Child Labor:** No one under the local legal age limit or the age of 15, whichever is greater, may be allowed to work in a facility that produces product or supplies services to Air Lease.

Anti-Discrimination and Fair Treatment: Suppliers will treat all workers with respect. There will be no unlawful discrimination, harassment or abuse of any kind. Suppliers will not engage in or permit discrimination or harassment based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by national or local law, in its workforce. This includes the Supplier’s hiring and employment practices such as promotions, rewards, and access to training. Air Lease expects that the Supplier will ensure equal opportunities throughout all ranks of employment.

Work Hours, Wages and Benefits: Suppliers will ensure that work schedules and overtime are consistent with all applicable laws, and Suppliers will provide workers with compensation that includes wages, overtime pay, and benefits that meet or exceed the legal minimum standards. Suppliers will ensure workers are paid in a timely fashion.

Health and Safety: Suppliers will provide a safe, clean and healthy work environment at all facilities. Suppliers are also responsible for having comprehensive health and safety management practices and job-specific safety training. If applicable, living conditions are clean, well maintained, provide reasonable entry and exit privileges for workers and in compliance with safety regulations. Workers will have the right to refuse and report unsafe or unhealthy working conditions.

Freedom of Association & Collective Bargaining: Suppliers will recognize and respect employees’ rights to freedom of association and collective bargaining, and provide opportunities, even where there is no representation by unions, for employee and external stakeholder concerns to be heard without fear of intimidation, harassment, retaliation, or violence.

Ethics

Business Integrity: Suppliers will comply with all anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act. Specifically, Suppliers cannot offer or accept any bribe, kickback, favor or use any improper influence when dealing with government officials or in any business arrangements. Suppliers will abide by economic sanctions or trade embargoes that the United States has adopted, whether they apply to foreign countries, political organizations or particular foreign individuals and entities. Suppliers must also comply with all laws related to Trade Restrictions and Export Controls, Anti-Money Laundering and the Office of Federal Asset Control provisions related to doing business with terrorists or illegitimate sources of funding.

Whistleblower Protection / Anti-retaliation: Suppliers will prohibit unlawful retaliation against workers who report a compliance or ethical issue learned during the course of work performed for Air Lease, or who cooperate in good faith with the investigation of a complaint. Suppliers will provide an anonymous compliant mechanism for workers to report grievances.

No Unfair Business Practices: Suppliers will act lawfully and with integrity in the proper handling and protection of competitive data and propriety information and comply with applicable laws regarding intellectual property, anti-trust and fair competition. Suppliers will safeguard confidential information to ensure that Air Lease, worker and customer privacy is protected.

Environmental

Environmental: In addition to complying with all applicable environmental laws, Air Lease expects our Suppliers to continually improve their own environmental performance, including complying with required environmental permits, waste management and air emission controls and noise management.

Responsible Sourcing: Suppliers shall have procedures in place to ensure that it is sourcing materials consistent with the principles of this Code. Suppliers are expected to take steps to determine whether products supplied to Air Lease contain any conflict minerals and if so, to have a policy to reasonably assure that conflict minerals in products manufactured by or for the Supplier do not directly or indirectly finance or benefit armed groups that are offenders of serious human rights abuses. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.

Compliance

Compliance with Law: Air Lease respects the law in its business operations and Air Lease expects our Suppliers to do the same by complying with all laws. If there is a conflict between what the law requires and the standards of this Code, Air Lease expects our Suppliers to meet the stricter or higher standard.

Compliance with this Code: Air Lease expects our Suppliers to be able to demonstrate compliance with this Code. If a Supplier cannot demonstrate compliance, does not cooperate during any inquiry about compliance or is not in compliance with this Code, Air Lease reserves the right to terminate any agreement or arrangement.

Reporting: To report a concern or violation of this code, please report to the Air Lease Supplier Code of Conduct Hotline hosted by Report It at www.reportit.net

For questions related to this code: ethics@airleasecorp.com

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